

EXHIBIT M

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I N D E X

EXAMINATION BY:	PAGE
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Ms. Baker -----	4
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EXHIBITS FOR IDENTIFICATION	PAGE
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Exhibit 1 Geo World, First Quarter 2017	36
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Tumwater, Washington; June 18, 2019

1:36 p.m.

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LEONARDO JARAMILLO,

sworn as a witness by the certified court reporter,

testified as follows:

E X A M I N A T I O N

BY MS. BAKER:

Q. Good afternoon, Mr. Jarmillo.

A. Good afternoon.

Q. As you know, my name is LaRond Baker. I'm an assistant general in the Civil Rights Division of the Attorney General's Office representing Washington in the lawsuit challenging Geo's practice of paying detainee workers a dollar a day for work that they perform in the Voluntary Work Program. Would you please state your full name and work address for the record.

A. My work address? I have to pull this out to give you the right address. Leonardo Jarmillo. I work at the Mason County Juvenile Detention Center in Shelton.

Q. We don't need the exact address. I think that's good.



1 people to want to participate?

2 A. It wasn't anything about encouraging, no.

3 Q. Why did you provide the extra food for
4 individuals who were buffing the floors or painting the
5 walls?

6 A. All the thing is, if there was work, they
7 would get something in return. It was not just the one
8 crew. We'd make sure that they were all treated fairly.

9 Q. But this was on top of the dollar that they
10 received?

11 A. Yes.

12 Q. Why did you feel the need give them more than
13 just a dollar for their work?

14 A. Because a lot of them would work, not for the
15 dollar. They worked for a chance to come out of their
16 rooms. A lot of detainees that worked, that worked,
17 would tell -- they'd tell me, You know, I don't come to
18 work for a dollar. I can't care about the dollar. You
19 can give that to somebody else. I want to get out of my
20 room.

21 Q. Right.

22 A. That was their -- that was what they wanted to
23 do.

24 Q. Did they also want extra food?

25 A. No. It was something that was available. And



1 through the academy. It's a five-week academy. So a
2 lot of this is brought out during the academy.

3 Q. During the academy Geo officers are trained
4 how to supervise detainee workers?

5 A. That's their job.

6 Q. Their job is to supervise detainee workers?

7 A. Especially if you're a unit officer, you're
8 going to be working, supervising detainees in all
9 aspects of whatever it is.

10 Q. Why is that?

11 A. It's their job. It's what they were hired
12 onto. They were hired to -- part of our job is direct
13 supervision.

14 Q. Direct supervision of detainee workers?

15 A. Any detainee, direct supervision.

16 Q. Did you ever directly supervise detainee
17 workers in the pods or living areas?

18 A. When I was an officer.

19 Q. But that was not at the Northwest Detention
20 Center; is that correct?

21 A. Yes, it was.

22 Q. You were an officer at the Northwest Detention
23 Center?

24 A. Yes, I was.

25 Q. What years was that?



1 that is marked as Exhibit 1 of your deposition. It's a
2 document that's called Geo World. It's the first
3 quarter of 2017. Are you familiar with this document?

4 A. Never seen this.

5 Q. You've never seen it before? Can you turn to
6 page 8.

7 A. (Witness complies.)

8 Q. Take a second to look at the article "Murals
9 Brighten Walls and Spirits." Have you seen this article
10 before?

11 A. Yes, ma'am.

12 Q. What it is?

13 A. It's detainees who are artists would -- it
14 started with one detainee wanting to paint on the wall a
15 mural. And once he started painting, then other
16 artists, you know, would request to paint something on
17 the wall. And they would go through the -- they'd
18 submit a request to the law librarian who'd bring it to
19 me. And I'd take a look at it along with the picture
20 that he wants to draw. And I'd take it to the warden.
21 I'd give it to the warden. The warden goes up to ICE.
22 And they'd talk about it. If it's approved, it's
23 approved and we will get the detainee and say, Okay,
24 you're good to go.

25 Q. So just to break it down a little bit,



1 Detainees would do -- they would not let me do what I
2 needed to do, because I was the type of person that I
3 started my career with Geo and through my career till I
4 ended, I did whatever any detainee did, any officer did.
5 And I always had that standard to myself that I would
6 never, just because I put on a different shift or
7 different badge than the officers or the detainees, that
8 I would never put myself above any of them.

9 And that's what I always told detainees that I
10 supervised as well: You're no -- I'm no better than you
11 are. Just because I got a different uniform, I still do
12 the same things you do. So I gained their respect.
13 That was probably, like I said, the best 25 years of my
14 life, working with detainees. And I never had a
15 detainee complain to me about anything.

16 Like I said, a lot of times, detainees would
17 always tell me: I don't work for the dollar. I don't
18 care about the dollar. I care about coming out of my
19 room, having something to do instead being stuck in my
20 room. Give my dollar to somebody else. I don't care.
21 He just wanted to do something. A lot of times, walking
22 the units, they'd ask me for something to do just so
23 they can keep themselves busy.

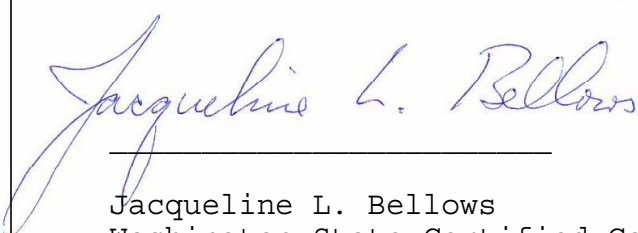
24 So, again, everybody is entitled to their, to
25 their opinions. I don't have any opinion either way.



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this
22nd day of June, 2019.



Jacqueline L. Bellows
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